

**HOGUET NEWMAN
REGAL & KENNEY, LLP**

One Grand Central Place
60 East 42nd Street, 48th Floor
New York, New York 10165

Tel 212.689.8808
Fax 212.689.5101
www.hnrklaw.com

hhechkopf@hnrklaw.com

April 23, 2021

VIA ECF

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *White v. MaBSTOA, et al.*, 18 Civ. 3627 (GBD)(DCF)

Dear Judge Daniels,

We represent the Defendants in this matter and write jointly with Plaintiff's counsel to respectfully request an adjournment of the status conference currently scheduled for April 28, 2021, and to provide the Court with a report on the status of discovery.

The parties are working to complete discovery and we anticipate being able to do so within 45 days. In the time since the parties' last letter to the Court, Plaintiff has taken the deposition of one of Defendant's witnesses, and another deposition is scheduled to take place next week.¹

The parties are also working to complete outstanding document discovery, which includes Plaintiff's need to serve additional documents pursuant to Defendants' outstanding document requests.

There are no discovery disputes at this time, but should one arise that requires judicial attention, we will bring it to the Court's attention without delay. Unless and until such time, the parties respectfully request that the status conference currently scheduled for April 28, 2021, be adjourned until on or after June 14, 2021, by which the parties anticipate fact discovery will be complete.

¹ Defendants continue to reserve their right to seek a further deposition of the Plaintiff and her husband at the conclusion of their criminal cases on the subjects precluded from their depositions by their invocation of their Fifth Amendment rights.

Hon. George B. Daniels
April 23, 2021
Page 2

HOGUET NEWMAN
REGAL & KENNEY, LLP

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'H R Hechtkopf', written over a horizontal line.

Helene R. Hechtkopf